

MOTION PICTURE ASSOCIATION

of America, Inc.

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Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street. NW. Room 222 Washington, D.C. 20554

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Re: MM Docket No. 87-268

Dear Mr. Caton:

Attached please find a copy of a letter from Jack Valenti, President and CEO of the Motion Picture Association of America, to Commissioner Susan Ness discussing the aspect ratio and progressive versus interlacing scanning technologies for advanced television. The letter refers to the open docket referenced above.

Sincerely,

Bonnie J. K. Richardson

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Forth of Community Your Demands in Office of Georgiany

JACK VALENTI
CHAIRMAN
AND
CHIEF EXECUTIVE OFFICER

November 12, 1996

1600 EYE STREET, NW WASHINGTON, D.C. 20006 TELEPHONE: 202/293-1966 TELECOPIER: 202/452-9823

Dem Susan

Thank you for your October 24 letter regarding the proposed digital television transmission standard. We in the production industry share your interest in resolving the technical dispute surrounding this issue.

As you know, MPAA is on record in support of the technical aspects of the Advanced Television Systems Committee's Digital Television Standard ("ATSC Standard"), in particular, the 16.9 aspect ratio and interlaced progressive scanning parameters in relation to interoperability. MPAA believes it is in the best interests of U.S. program providers to lead the way in promoting the emergence of common worldwide technical standards. The 16:9 screen aspect ratio contained in the ATSC Standard will provide maximum accommodation for the transmission of video material original produced in different aspect ratios and will facilitate international program exchange. Moreover, an interlaced transmission format will allow for the broadcast transmission of live action in high definition until such time as technology permits transmission of this quantity of picture information in a progressive format.

There is no evidence that the mandatory 480 line baseline format proposed by The Computer Industry Coalition and The Coalition of Film Makers would permit high-definition television (HDTV) from the outset. The proposed ATSC digital television standard will enable theater-quality high resolution films to be displayed on high-definition television sets immediately. For the first time, television viewers will be able to experience movies in their homes on wide screen receivers with picture clarity and surround sound that approaches that available in movie theaters. The ATSC digital television technical standards can provide capability, giving more than twice the vertical resolution (using the 1080 line, progressive scan, 24 frame per second format) than the 480 line baseline format would provide. MPAA believes that broadcasters should have the option of choosing HDTV and, therefore, opposes a mandatory 480 baseline format.

Further, in light of the enormous investment to date by the industry, the government and the public in the existing telecommunications infrastructure, interoperability of digital television with other media is a critical goal of this proceeding. MPAA believes the Standard provides the maximum interoperability with other video media resulting from a variety of scanning parameters that include the interlaced format. The digital TV Grand Alliance system and the ATSC Standard recommended to the Commission by the Advisory Committee represent by far the most interoperable broadcast television system ever conceived. While a majority of video, all motion pictures, and all other material originating in film, including most prime time television programs and commercials, will be transmitted using the

progressive scanning formats, the inclusion of interlaced formats is essential to broadcasters to enable them to transmit both live action events and archived interlaced video programs efficiently and to promote easy interoperability with cable television and satellite services and with international digital video standards, all of which currently utilize interlaced scanning. Moreover, interlaced transmission can be displayed progressively with minimal additional cost to home television receivers.

Additionally, I wish to correct the misimpression that all of the Hollywood community oppose the 16:9 aspect ratio. To the contrary, MPAA believes that the ATSC Standard provides for viewing pictures in virtually any aspect ratio on a 16:9 receiver by using letter boxing or side panels in those cases where the picture does not exactly fit the screen. A 16:9 aspect ratio has been proven through the Advisory Committee process to be an appropriate standard. This decision was initially reached over a decade ago after extended and careful deliberations, with extensive participation by the motion picture and television production communities. The Computer Industry Coalition and the Coalition of Film Makers have averred that the standard forces broadcasters to pan and scan. To the contrary, the ATSC Standard does not require that transmitted programs conform to a 1.78:1 (16:9) or a 1.33:1(4:3) aspect ratio. With a 16:9 receiver, wide-screen feature films (i.e., 1.85:1 and greater) can be viewed in their original formats by using letter boxing. (About 80% of films are 1.85:1, these films would lose only about 4% of their screen height when shown at full width. The remaining 20% of films are 2.4:1, these films would lose about 25% of their screen height.) Because of the

wide variety of aspect ratios used by the motion picture industry in the U.S. and throughout the world, it would not be possible to select a single aspect ratio that perfectly satisfied every need. However, it has been demonstrated that the 16:9 format can accommodate program material or motion picture films of any reasonable aspect ratio.

Finally, the U.S. broadcasting television and computer industries are among the largest and fastest growing sectors of the U.S. economy. These industries contributed at least an estimated \$24 billion in foreign revenues to the U.S. economy in 1994. Moreover, together with other copyright-based industries, the filmed entertainment industry is second only to motor vehicles and automotive parts among U.S. industries in terms of estimated foreign sales and exports. MPAA believes it is in the best interest of U.S. program providers to lead the way in promoting the emergence of common worldwide technical standards. In particular, the 16:9 aspect ratio of the ATSC Standard, also adopted in Europe and Japan, will facilitate international program exchange by minimizing the cost of technology conversion and thereby maintaining cost competitiveness. Additionally, the ATSC Standard is sufficiently flexible to conform to existing international agreements on digital television and thus will present minimal technical barriers to the continued flow of programming from and to all parts of the world.

I hope this letter states clearly the MPAA posture.

As always, thank you for your interest and support of our industry.

cc: Chairman Reed Hundt Commissioner James Quello Commissioner Rachel Chong

The Honorable Susan Ness Commissioner Federal Communications Commission 1919 M Street, N.W. - Room 832 Washington, DC 20554